

HARRIS BEACH PLLC
ATTORNEYS AT LAW

May 4, 2023

677 BROADWAY, SUITE 1101
ALBANY, NY 12207
(518) 427-9700

FILED ELECTRONICALLY VIA ECF

United States District Judge Jennifer H. Rearden
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

ELLIOT A. HALLAK
PARTNER
DIRECT: (518) 701-2748
FAX: (518) 427-0235
EHALLAK@HARRISBEACH.COM

Re: *Robert Nock v. Spring Energy RRH, LLC et al.*, United States District Court, Southern District of New York, Case No. 1:23-cv-01042

This office represents the Defendants, Spring Energy RRH, LLC d/b/a Spring Power & Gas; RRH Energy Services, LLC; and Richmond Road Holdings, LLC in the above-referenced matter. I write jointly and with the consent of counsel for Plaintiff, Robert Nock, and pursuant to Paragraph 2.E. of Your Honor's Individual Rules and Practices in Civil Cases, respectfully requesting a 60-day adjournment of the upcoming Rule 16 conference and all pending deadlines in this matter as the parties are reviewing the allegations and attempting to determine whether an early resolution can be reached.

This action asserts claims under the Telephone Consumer Protection Act and Maryland state law. Counsel for the parties have been in discussions and are exchanging information to review the claims. In the interest of conserving the resources of the parties and the Court and allowing the parties to focus their efforts on determining whether this matter can be resolved at this time, the parties believe that a sixty (60) day adjournment/extension of the upcoming May 15, 2023 Rule 16 conference and all other pending deadlines is appropriate. There have been no previous requests for an extension or adjournment of these deadlines. As a Civil Case Management Plan and Scheduling Order has not yet been issued, this request addresses matters in connection with the Court's Notice of Initial Pretrial Conference (ECF No. 17) and Defendants' deadline to respond to the Amended Complaint (ECF No. 18), but other case management deadlines will not be affected by this request.

Accordingly, the parties jointly and with the consent of all parties hereby respectfully request a 60-day adjournment/extension of any conferences and all pending deadlines to afford the parties sufficient time to review the matter and explore a potential early resolution. This adjournment would potentially avoid the use of resources of the parties and the Court. Thank you for your consideration of this matter.

Very truly yours,
/s/ Elliot A. Hallak
Elliot A. Hallak

SO ORDERED:

Jennifer H. Rearden
United States District Judge